

## Shane R. Heskin

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May 26, 2022

Via CM/ECF

The Hon. Colleen McMahon United States District Court Southern District of New York 500 Pearl Street, Room 2550 New York, New York 10007 APPLICATION GRANTED SO ORDERED

John G. Koeltl, U.S.D.J.

Re:

FTE Networks, Inc. v. Adar Bays LLC, et al., Case No. 22-CV-03396-CM (SDNY)

Judge McMahon:

Pursuant to the Court's Individual Practices and Procedures, we submit this letter motion on behalf of FTE Networks, Inc. ("FTE") to request an extension of time for FTE to file a RICO Case Statement.

FTE initiated this action on April 26, 2022. The action concerns the defendants' long-running scheme to collect upon unlawful debts and otherwise fraudulently obtain thousands of dollars in funds from FTE in violation of the Racketeer Influenced and Corrupt Organizations Act ("RICO") and New York's criminal usury laws. An Electronic Summons was issued for each defendant and FTE is in the process of completing service. The Court has set an initial pretrial conference for September 29, 2022.

FTE requests that its time to file a RICO Case Statement be extended to June 24, 2022 so that it may complete service on the eight defendants before submitting the case statement. FTE has not previously requested any adjournments or extensions of time. The proposed extension will not impact any other scheduled dates.

Respectfully Submitted,

WHITE AND WILLIAMS LLP

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Shane R. Heskin